

1 WRIGHT, FINLAY & ZAK, LLP  
2 Robert A. Riether, Esq.  
3 Nevada Bar No. 12076  
4 Rock K. Jung, Esq.  
5 Nevada Bar No. 10906  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
8 (702) 475-7964; Fax: (702) 946-1345  
9 [rjung@wrightlegal.net](mailto:rjung@wrightlegal.net)

10 *Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee for ABFC 2004-OPT3 Trust, ABFC*  
11 *Asset-Backed Certificates, Series 2004-OPT3*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 WELLS FARGO BANK, N.A., AS TRUSTEE  
15 FOR ABFC 2004-OPT3 TRUST, ABFC  
16 ASSET-BACKED CERTIFICATES, SERIES  
17 2004-OPT3,

18 Plaintiff,

19 vs.

20 KARI LEE LIMITED PARTNERSHIP;  
21 SATICOY BAY, LLC SERIES 5451  
22 AUTUMN CROCUS; ALARISA  
23 PROPERTIES, LLC; ARBOR PARK  
24 COMMUNITY ASSOCIATION; ABSOLUTE  
25 COLLECTION SERVICES LLC,

26 Defendants.

Case No.: 2:17-cv-01184-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINES**

**[FIRST REQUEST]**

27 Plaintiff, Wells Fargo Bank, N.A., as Trustee for ABFC 2004-OPT3 Trust, ABFC Asset-  
28 Backed Certificates, Series 2004-OPT3 (“Wells Fargo” or “Plaintiff”)), Defendant, Saticoy  
Bay, LLC Series 5451 Autumn Crocus (“Saticoy Bay”), Defendant, Absolute Collection  
Services, LLC (“ACS”) and Defendant, Arbor Park Homeowners Association (“HOA”), by  
and through their respective attorneys of record, hereby stipulate and agree as follows:

1 WHEREAS, the parties agree to extend dispositive motion deadlines from April 26, 2019  
2 to June 10, 2019, to allow the parties additional time to reach a global resolution. The parties  
3 have not yet reached an agreement, but they feel one is still possible and additional time is  
4 requested to explore settlement and exchange offers. Therefore,

5 IT IS HEREBY STIPULATED AND AGREED that the dispositive motion deadline  
6 should be continued for 45 days from April 26, 2019 to June 10, 2019, to permit the parties  
7 additional time to discuss potential settlement and resolution of all pending claims.

8 IT IS HEREBY STIPULATED AND AGREED that if a global resolution is not reached  
9 prior to the extended dispositive motion deadline, then the parties shall proceed with dispositive  
10 motion practice.

11 This is the parties' first request for extension of the deadline to file dispositive  
12 motions. This request is not intended to cause any delay or prejudice to any party.

13 IT IS SO STIPULATED.

14  
15 DATED this 23<sup>rd</sup> day of April, 2019.

DATED this 23<sup>rd</sup> day of April, 2019.

16 WRIGHT, FINLAY & ZAK, LLP

LAW OFFICES OF MICHAEL F. BOHN,  
ESQ., LTD.

17  
18 /s/ Rock K. Jung, Esq.

/s/ Michael F. Bohn, Esq.

19 Robert A. Riether, Esq.  
20 Nevada Bar No. 12076  
21 Rock K. Jung, Esq.  
22 Nevada Bar No. 10906  
23 7785 W. Sahara Ave., Suite 200  
24 Las Vegas, NV 89117  
Attorneys for Plaintiff, Wells Fargo Bank,  
N.A., as Trustee for ABFC 2004-OPT3 Trust,  
ABFC Asset-Backed Certificates, Series 2004-  
OPT3

Michael F. Bohn, Esq.  
Nevada Bar No. 1641  
Adam R. Trippiedi, Esq.  
Nevada Bar No. 12294  
2260 Corporate Circle, Suite 480  
Henderson, Nevada 89074  
Attorney for Defendant, Defendant Saticoy  
Bay LLC

25  
26  
27 Signatures continued on next page  
28

1 DATED this 23<sup>rd</sup> day of April, 2019.

DATED this 23<sup>rd</sup> day of April, 2019.

2 ABSOLUTE COLLECTION SERVICES,  
3 LLC

TYSON & MENDES, LLP

4 /s/ Shane D. Cox, Esq.

/s/ Margaret E. Schmidt, Esq.

5 Shane D. Cox, Esq.

Margaret E. Schmidt, Esq.

6 Nevada Bar No. 13852

Nevada Bar No. 12489

8440 W. Lake Mead Blvd., Suite 210

3960 Howard Hughes Pkwy, Suite 600

Las Vegas, NV 89128

Las Vegas, Nevada 89169

7 *Attorneys for Defendant, Absolute Collection*

*Attorney for Defendant, Arbor Park*

*Services, LLC*

*Homeowners Association*

9 **ORDER**

10 IT IS SO ORDERED:

11   
UNITED STATES MAGISTRATE JUDGE

12 4-24-2019

13 DATED: \_\_\_\_\_